United States Department of Agriculture
Food Safety And Inspection Service
Technical Service Center
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SPECIAL AUDIT REPORT FOR NEW ZEALAND

September 6 through September 8, 2001

INTRODUCTION

Background

This report reflects information that was obtained during an audit of New Zealand's inspection system for ratites from September 6 through September 8, 2001. Only one establishment certified to export ratite meat to the United States was audited for an equivalence evaluation under the United States Department of Agriculture (USDA), Food Safety and Inspection Service's (FSIS) the mandatory poultry inspection regulations as described in Code of federal regulations, Title 9, Chapter III and Parts 381.6 and 381.7 effective April 26, 2001

This is the first FSIS audit of a ratite (poultry) inspection system in New Zealand. The last audit of the New Zealand meat (bovine and ovine) inspection system was conducted in March 2001, when nine establishments were audited.

During calendar year 2001 (January to September-2001) New Zealand exported 415, 530, 822 pounds of fresh beef and beef products, beef edible organs, veal, mutton and lamb products to the U.S. Port-of-entry rejections were 1, 058, 581 pounds (.2547%) for processing defects, miscellaneous defects, contamination, pathological defects, and transportation damage and missing shipping marks.

PROTOCOL

This on-site audit was conducted in two parts. One part involved visits with New Zealand's national meat inspection officials to discuss oversight programs and practices, including enforcement and compliance activities regarding ratite products. The second entailed an audit of the establishment on-site.

New Zealand's program effectiveness was assessed by evaluating five areas of risk: (1) sanitation controls, including the implementation and operation of Sanitation Standard Operating Procedures (SSOPs), (2) animal disease controls, (3) residue controls, (4) slaughter/ processing controls, including the implementation and operation of Hazard Analysis and Critical Control Point (HACCP) systems and the generic *E. coli* testing program; and (5) enforcement controls, including the testing program for *Salmonella* species.

During the on-site establishment visit, the auditor evaluated the nature, extent, and degree to which findings impacted on food safety and public health, as well as overall program delivery. The auditor also determined if establishment and inspection system controls were in place. Establishments that do not have effective controls in place to prevent, detect and eliminate product contamination/adulteration are considered unacceptable and therefore ineligible to export products to the U.S., and are delisted accordingly by the country's meat inspection officials.

RESULTS AND DISCUSSION

Summary

Effective inspection system controls were lacking in the establishment audited (Est. 117). Details of audit findings and observations, including compliance with HACCP programs, SSOPs, and testing programs for *Salmonella* and generic *E. coli* are discussed later in this report.

Entrance Meeting

On September 6, 2001, an entrance meeting was held at Ministry of Agriculture and Forestry (MAF) of New Zealand at Wellington, and was attended by Mr. Glen Neal, Lindsay Nicholls, Carolyn Andrews, MAF Food Assurance Authority (FAA); Dr. Geoff Allen, Director Compliance and Investigation Group, MAF-FAA; Ms. Judy Barker, Program Manager; MAF-FAA; Dr. Suresh Singh, International Audit Staff Officer and Dr. Ghias Mughal, Chief, International Review Staff of the Food Safety and Inspection Service (FSIS) of the United States Department of Agriculture (USDA). Topics of discussion included the following:

1. Welcome by MAF-FAA and a presentation of the structure of the New Zealand Meat Inspection Program.

2. Ratite National Microbiological Database of New Zealand (NZ).

3. Previous audit issues and Washington correspondence.

Headquarters Audit

There had been no changes in the organizational structure or upper levels of inspection staffing since the last U.S. audit of the New Zealand inspection system.

To gain an accurate overview of the effectiveness of inspection controls, FSIS requested that the compliance inspection officials who normally conduct the periodic reviews and audits for compliance with U.S. specifications lead the audits of the individual establishment. The FSIS auditor (hereinafter called "the auditor") observed and evaluated the process.

No records review was conducted at the headquarters. The records review at the establishment (117) focused primarily on food safety hazards and was conducted at the establishment and included the following:

- Internal review reports and compliance check/list
- A compliance visit to the establishment that was certified to export to the U. S.
- Training records for inspectors
- Records such as generic labels, and animal raising claims.

- New laws and implementation documents such as regulations, notices, directives and guidelines.
- Sampling and laboratory analyses for residues.
- Pathogen reduction and other food safety initiatives such as SSOPs, HACCP programs, generic *E. coli* testing and *Salmonella* testing.
- Sanitation, slaughter and processing inspection procedures and standards.
- Control of products from livestock with conditions such as tuberculosis, cysticercosis, etc., and of inedible and condemned materials and veterinary coverage.
- Export product inspection and control including export certificates.
- Enforcement records including examples of criminal prosecution, consumer complaints, recalls, seizure and control of noncompliant product, and withholding, suspending, withdrawing inspection services from or delisting an establishment that is certified to export product to the United States.

No concerns arose as a result of the examination of these documents.

Government Oversight

All inspection veterinarians and inspectors in establishments certified by New Zealand as eligible to export meat products to the United States were full-time, MAF Verification Agency and Asure NZ employees, receiving no remuneration from either industry or establishment. Asure inspectors are occasionally contracted out to the establishment to perform quality assurance functions. This use of Asure employees by establishments continues to be an equivalence issue. There are three independent agencies: MAF Food Assurance Authority (MAFFAA); MAF Verification Agency (MAFVA) and Asure New Zealand (ANZ) within the Agriculture and Forestry Ministry. Most of the field veterinary inspection officials are employed by MAFVA; most of the central government officials are employed by MAFFAA; and inspectors in the establishments are employed by Asure NZ. All three agencies work under guidelines of a Memorandum of Understanding.

Establishment Audit

Only one establishment was certified to export meat from ratites to the United States at the time this audit was conducted. Only one establishment (ME-117) was visited for an on-site audit. In this establishment, both New Zealand inspection system controls and establishment system controls were in place to prevent, detect and control contamination and adulteration of products except as noted below.

Laboratory Audits

No laboratory audits were conducted.

Establishment Operations by Establishment Number

Ratite (Ostrich) slaughter, cutting, and boning were being conducted in Establishment ME-117 when it was visited for this audit.

But on a routine basis, the establishment's operations were:

Slaughtering, cutting and boning of ratites on Tuesday and Wednesday.
Slaughtering, cutting and boning of equine on Friday and Monday.
Slaughtering of bovine-custom kill on Thursday.

SANITATION CONTROLS

Based on the on-site audit of the establishment, New Zealand's inspection system had controls in place for water potability, hand washing facilities, sanitizers, pest control program, temperature control, lighting, and ventilation. Basic establishment facilities, condition of facilities and equipment, product protection and handling and establishment sanitation programs were acceptable, except as noted below.

- Facilities and equipment were not maintained properly: there were several places where the floor, a wall and a door were broken and in need of repair.

Sanitation Standard Operating Procedures (SSOPs)

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOPs were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument used accompanies this report (Attachment A).

The SSOPs were found to meet the basic FSIS regulatory requirements.

Cross-Contamination

- Fecal contamination was observed on one ostrich carcass. It was railed out immediately and MAF Verification Veterinary officials took corrective actions.

- Potential contamination was observed at the skinning operation from armpits of workers because all workers wore sleeveless shirts.

Humane Slaughter

- A stunning device was not working properly.

Maintenance

- A wall in a carcass cooler was in need of repair. Establishment officials agreed to repair and modify the facilities and agreed on time schedule with MAF Verification and Compliance authorities.

Personnel Hygiene and Practices

- Establishment employees were wearing sleeveless shirts that provided potential problems for contamination of product in summer months.

ANIMAL DISEASE CONTROLS

New Zealand's inspection system had controls in place to ensure adequate animal identification, ante-mortem and post-mortem inspection procedures and dispositions, condemned and restricted product control, and procedures for sanitary handling of returned and rework product.

There were reported to have been no outbreaks of animal diseases with public-health significance since the previous U.S. audit.

RESIDUE CONTROLS

New Zealand's National Residue Testing Plan for 2001, which included ratites, was being followed, and was on schedule.

The New Zealand inspection system had adequate controls in place to ensure compliance with sampling and reporting procedures and storage and use of chemicals. The Animal Products Act of 1999 reforms the New Zealand law that regulates the production and processing of animal materials and products to manage associated risks including drug and chemical residues.

SLAUGHTER/PROCESSING CONTROLS

The New Zealand inspection system had controls in place to ensure adequate humane handling and slaughter, packaging materials, label approvals, inspector monitoring, and processing (boning and cutting) equipment and records except for the deficiency noted on the FSIS Form 9520-2 (Attachment F) which was many feathers on carcasses.

HACCP Implementation

All establishments approved to export meat products to the U.S. are required to have developed and implemented a Hazard Analysis – Critical Control Point (HACCP) system. Each of these systems was evaluated according to the criteria employed in the U.S. domestic inspection

program and met FSIS requirements. The data collection instrument used accompanies this report (Attachment B).

Testing for Generic *E. coli*

New Zealand was testing for generic *E. coli* in ratites, and basic requirements were met except following:

- Testing frequency was based on National Microbiological Database with at least five carcasses per week at three sites regardless of production volume.

- The predominant class of animals slaughtered in the establishment was sampled.

ENFORCEMENT CONTROLS

Inspection System Controls

The New Zealand inspection system controls [ante-and post-mortem inspection procedures and dispositions, control of restricted product and inspection samples, control and disposition of dead, dying, diseased or disabled animals, boneless meat re-inspection, shipment security, including shipment between establishments, prevention of commingling of product intended for export to the United States with domestic product, monitoring and verification of establishment programs and controls (including taking and documentation of corrective actions under HACCP plans), inspection supervision and documentation, the importation of only eligible livestock or poultry from other countries (i.e., only from eligible countries and certified establishments within those countries), and the importation of only eligible meat or poultry products from other counties for further processing] were in place and effective in ensuring that products produced by the establishment were wholesome, unadulterated, and properly labeled. In addition, adequate controls were found to be in place for security items, shipment security, and products entering the establishments from outside sources.

In Establishment 117, horse slaughter and cutting activities are done on Mondays and Fridays, however, the auditor requested that GON to seek policy requirements from Washington.

Testing for *Salmonella* Species

New Zealand has not adopted any testing procedures and has not set any performance standard for *Salmonella* on ratite carcasses at the time of this audit.

Species Verification Testing

At the time of this audit, New Zealand was not exempt from the species verification-testing requirements. The auditor verified that species verification testing was being conducted in accordance with FSIS requirements.

Monthly Reviews

The National Compliance and Investigation Group, equivalent to our Domestic Review, was performing the in-depth reviews and audits. National and Regional Assessors report to the Director, Compliance and Investigation of MAFFAA. Team Leaders of MAF-VA conduct the monthly review based on the risk performance program called Performance Based Verification (PBV). Most of the team leaders of MAFVA are veterinarians with at least 5-15 years of experience. The establishment was not being reviewed routinely on a monthly basis because of its PBV performance.

The internal review program was not applied equally to both export and non-export establishments. Internal review visits were not announced in advance, and were conducted, at times by Team Leaders and at other times by Compliance Group Reviewers. The records of audited establishments were kept in the inspection offices of the individual establishments, and copies were also kept in the central MAF offices in Wellington, and were routinely maintained on file for a minimum of three years.

In the event that an establishment is found, during one of these internal reviews, to be out of compliance with U.S. requirements, and is delisted for U.S. export, before it may again qualify for eligibility to be reinstated, the Compliance Group is empowered to conduct an in-depth review, and the results are reported to MAFFA for evaluation; they formulate a plan for corrective actions and preventive measures.

Enforcement Activities

Enforcement activities are enabled through a Memorandum of Understanding between all government agencies involved with all aspects of the meat production and distribution system. MAF-Food Assurance Authority has the sole power to initiate all enforcement actions.

Exit Meeting

No exit meeting was conducted.

CONCLUSION

The inspection system of New Zealand was found to have effective controls to ensure that product destined for export to the United States was produced under conditions equivalent to those which FSIS requires in domestic establishments. One ratite establishment was audited and was

evaluated as acceptable / re-review. The deficiencies encountered during the on-site establishment audit were adequately addressed to the auditor's satisfaction.

Dr. Suresh P. Singh (signed) Dr. Suresh P. Singh
International Audit Staff Officer

ATTACHMENTS

A. Data collection instrument for SSOPs
B. Data collection instrument for HACCP programs
C. Data collection instrument for *E. coli* testing
D. Data collection instrument for *Salmonella* testing – *not applicable*
E. Laboratory Audit Form – *not applicable*
F. Individual Foreign Establishment Audit Form
G. Written Foreign Country's Response to the Draft Final Audit Report

Attachment A

Data Collection Instrument for SSOPs

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for SSOPs were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument contained the following statements:

1. The establishment has a written SSOP program.
2. The procedure addresses pre-operational sanitation.
3. The procedure addresses operational sanitation.
4. The pre-operational procedures address (at a minimum) the cleaning of food-contact surfaces of facilities, equipment, and utensils.
5. The procedure indicates the frequency of the tasks.
6. The procedure identifies the individuals responsible for implementing and maintaining the activities.
7. The records of these procedures and any corrective action taken are being maintained on a daily basis.
8. The procedure is dated and signed by the person with overall on-site authority.

The results of these evaluations were as follows:

Est. #	1.Written program addressed	2. Pre-op sanitation addressed	3. Oper. sanitation addressed	4. Contact surfaces addressed	5. Fre-quency addressed	6. Respons-ible indiv. Identified	7. Docu-mentation done daily	8. Dated and signed
ME117	√	√	√	√	√	√	√	√

Attachment B

Data Collection Instrument for HACCP Programs

Each of the establishment approved to export meat products to the U.S. was required to have developed and implemented a Hazard Analysis – Critical Control Point (HACCP) system. Each of these systems was evaluated according to the criteria employed in the U.S. domestic inspection program. The data collection instrument included the following statements:

1. The establishment has a flow chart that describes the process steps and product flow.
2. The establishment had conducted a hazard analysis.
3. The analysis includes food safety hazards likely to occur.
4. The analysis includes the intended use of or the consumers of the finished product(s).
5. There is a written HACCP plan for each product where the hazard analysis revealed one or more food safety hazard(s) reasonably likely to occur.
6. All hazards identified in the analysis are included in the HACCP plan; the plan lists a CCP for each food safety hazard identified.
7. The HACCP plan specifies critical limits, monitoring procedures, and the monitoring frequency performed for each CCP.
8. The plan describes corrective actions taken when a critical limit is exceeded.
9. The HACCP plan was validated using multiple monitoring results.
10. The HACCP plan lists the establishment's procedures to verify that the plan is being effectively implemented and functioning and the frequency for these procedures.
11. The HACCP plan's record-keeping system documents the monitoring of CCPs and/or includes records with actual values and observations.
12. The HACCP plan is dated and signed by a responsible establishment official.

The results of these evaluations were as follows:

Est. #	1. Flow diagram	2. Hazard analysis conducted	3. All hazards identified	4. Use & users included	5. Plan for each hazard	6. CCPs for all hazards	7. Monitoring is specified	8. Corr. actions are described	9. Plan validated	10.Adequate verific. Procedures	11.Adequate documentation	12. Dated and signed
ME117	√	√	√	√	√	√	√	√	√	√	√	√

Attachment C

Data Collection Instrument for Generic *E. coli* Testing

Each establishment was evaluated to determine if the basic FSIS regulatory requirements for generic *E. coli* testing were met, according to the criteria employed in the U.S. domestic inspection program. The data collection instrument contained the following statements:

1. The establishment has a written procedure for testing for generic *E. coli.*
2. The procedure designates the employee(s) responsible to collect the samples.
3. The procedure designates the establishment location for sample collecting.
4. The sample collection is done on the predominant species being slaughtered.
5. The sampling is done at the frequency specified in the procedure.
6. The equivalent carcass site and collection methodology (Swab) is being used for sampling.
7. The carcass selection is following the random method specified in the procedure or is being taken randomly.
8. The laboratory is analyzing the sample using an AOAC Official Method .
9. The results of the tests are not being recorded on a process control chart but on a table form showing the most recent test results.
10. The test results are being maintained for at least 12 months.

Est. #	1.Written procedure	2. Sampler designated	3.Sampling location given	4. Predomin. species sampled	5. Sampling at the req'd freq.	6. Proper site or method	7. Sampling is random	8. Using AOAC method	9. Chart or graph of results	10. Results are kept at least 1 yr
117	√	√	√	√	√	√	√	√	√	√